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April 7, 2016

VIA ECF

The Honorable Richard D. Bennett
United States District Judge
United States District Court
for the District of Maryland
101 West Lombard St.
Baltimore, MD 21201

FILED ENTERED
LODGED RECEIVED

APR 8 2016

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

Re: Mark Baden, Jr. v. Caroline County Public Schools
Civil Action No. RDB - 16 -335


Dear Judge Bennett:

This is a letter sent jointly by the parties. Mark Baden, Jr., the pro se Plaintiff, has reviewed and approved the delivery of this letter; he has personally typed in his name on the signature line below in the Word version of this letter.

Mr. Baden and I had our conference call on Tuesday, April 5, 2016 regarding the Scheduling Order recently issued in this case. We agreed to jointly request the following:

- Modification of the Scheduling Order so that the following deadlines are extended by 45 days, as follows:
 - Discovery Deadline/Submission of Status Report - extend from August 10, 2016 to September 26, 2016
 - Requests for Admission - extend from August 17, 2016 to October 3, 2016
 - Dispositive Pretrial Motions Deadline - extend from September 9, 2016 to October 25, 2016
- Defer expert disclosures and expert discovery until after court resolution of dispositive motions.
- We jointly request that a settlement/ADR conference be held once we have engaged in some discovery. With a revised discovery deadline of September 26, 2016, a conference in July or August would allow sufficient time to undertake some written discovery and depositions and then be in a position to have an informed settlement/ADR conference.

Request Granted this 8th day of April, 2016.


Richard D. Bennett
United States District Judge

The Honorable Richard D. Bennett

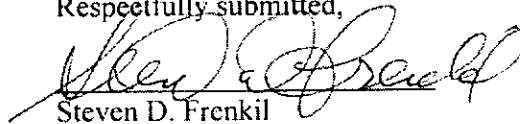
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- We agree that the standard 30 hours of deposition per side is appropriate.
- We do not jointly consent to proceed before a U.S. Magistrate Judge.
- We do not plan to take discovery of electronically stored information.

The parties are available for a conference call if Your Honor wishes to discuss any of these topics with us. Thank you.

Respectfully submitted,



Steven D. Frenkil
Counsel for Defendant

Mark Baden, Jr.

Mark Baden, Jr.

Plaintiff (pro se)

cc: Mark Baden, Jr.
Plaintiff (pro se)